

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA

v.

Case No. 3:20-cr-00003

QUOTEZ T. PAIR,
Defendant.

MOTION FOR APPOINTMENT OF CO-COUNSEL

COMES NOW, Defense Counsel, Miriam Airington-Fisher, and requests that this Court permit Jennifer Quezada, to assist at trial in this case. In support hereof, Defense Counsel states as follows:

1. Defense Counsel suffered an injury to her right arm which required surgery to repair broken bones. The expected recovery time is four (4) weeks.
2. Defense Counsel's right hand is her dominant hand.
3. Defense Counsel will have limited mobility of her right arm during Defendant's March 8, 2021 scheduled trial, and will need assistance at counsel table with taking notes, and handling exhibits.
4. Defense Counsel's associate attorney, Jennifer Quezada, is part of the CJA panel.
5. This request is made to avoid any delay to trial or prejudice to the Defendant.
6. Defense Counsel has informed Ms. Emerson, Attorney for the Government of this request, and she does not oppose this request.

WHEREFORE, Defense Counsel respectfully requests this Court appoint Jennifer Quezada as Co-Counsel.

Respectfully Submitted,
QUOTEZ PAIR
By Counsel

/s/

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CERTIFICATE OF SERVICE

I certify that on this 24th day of February, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification (NEF) to: Olivia L. Norman, Assistant U.S. Attorney, at Olivia.Emerson@usdoj.gov

/s/

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